

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFF BRADLEY GOOD and EDWARD

SOUCEK on behalf of themselves and all others similarly

(b) County of Residence of First Listed Plaintiff Delaware
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number) Cary L. Flitter, Esq. and Andrew M. Milz, Esq., Flitter Lorenz, P.C., 450 N. Narberth Avenue, Suite 101, Narberth, PA 19072, (610) 822-0782

DEFENDANT NATIONWIDE CREDIT, INC.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | |
|--|---|----------------------------|----------------------------|
| PTF | DEF | PTF | DEF |
| Citizen of This State <input type="checkbox"/> 1 | <input type="checkbox"/> 1 Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State <input type="checkbox"/> 2 | <input type="checkbox"/> 2 Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 | <input type="checkbox"/> 3 Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Denotation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1692

Brief description of cause: Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint
JURY DEMAND: ☒ Yes ☐ No.

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 342 W. Second Street, Media, PA 19063-2302 & 729 Saginaw Street, Scranton, PA 18505

Address of Defendants: 2002 Summit Boulevard, Suite 600, Atlanta, GA 30319

Place of Accident, Incident or Transaction: Media, PA 19063 & Scranton, PA 18505

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases

(Please specify) Fair Debt Collection Practices Act, 15 U.S.C. § 1692

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability (Asbestos)
9. ☐ All other Diversity Cases
(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, _____, counsel of record do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought

DATE: 7/14/14

Attorney-at-Law

35047

Attorney I.D.

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 7/14/14

CIV.609 (4/03)

Attorney-at-Law

35047

Attorney I.D.

APPENDIX I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

BRADLEY GOOD and EDWARD SOUCEK, on behalf of	:	CIVIL ACTION
themselves and all others similarly situated	:	
V.	:	
	:	NO.
NATIONWIDE CREDIT, INC.	:	

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases) (X)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

7/14/14
Date

610-822-0782
Telephone
(Civ.660) 10/02


Attorney at Law

610-667-0552
Fax Number

Cary L. Flitter
Attorney for Plaintiff

cflitter@consumerslaw.com
E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRADLEY GOOD
342 W. Second Street
Media, PA 19063-2302

and

EDWARD K. SOUCEK
729 Saginaw Street
Scranton, PA 18505

on behalf of themselves and all others
similarly situated

Plaintiff,

vs.

NATIONWIDE CREDIT, INC.
2002 Summit Boulevard,
Suite 600
Atlanta, GA 30319,

Defendant

CLASS ACTION

NO.

COMPLAINT

I. INTRODUCTION

1. This is a consumer class action for damages brought pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. §1692 (“FDCPA”). The FDCPA prohibits debt collectors from engaging in deceptive and unfair practices in the collection of consumer debt.

2. Defendant debt collector has sent out collection notices to Plaintiffs and the putative class that state that the lender “is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more.” Under prevailing IRS regulation, sending a 1099C is frequently not required. The statement is both false and misleading, in violation of the Act.

II. JURISDICTION

3. Jurisdiction arises under the FDCPA, 15 U.S.C. §1692k, and 28 U.S.C. §§1331 and

1337.

4. *In personam* jurisdiction exists and venue is proper as Defendant does business in this district and has caused harm in this district.

III. PARTIES

5. Plaintiff Bradley Good is a consumer who resides in Media, Pennsylvania at the address captioned above.

6. Plaintiff, Edward K. Soucek is a consumer who resides in Scranton, Pennsylvania at the address captioned above.

7. Defendant Nationwide Credit, Inc. ("Nationwide") is a Georgia corporation with an office for the regular transaction of business as captioned.

8. Nationwide regularly uses the mail and telephone to attempt to collect consumer debts alleged to be due another.

9. Nationwide regularly engages in business and collect debts in the Eastern District of Pennsylvania and the Middle District of Pennsylvania.

10. Nationwide is a "debt collector" as that term is contemplated in the FDCPA, 15 U.S.C. §1692a(6).

IV. STATEMENT OF CLAIM

11. On September 9, 2013, Defendant Nationwide sent Plaintiff Soucek a communication in connection with a consumer debt allegedly due GE Capital Retail Bank. (*See* correspondence from Nationwide attached hereto as Exhibit "A", redacted per Fed. R. Civ. Pro. 5.2).

12. In the September 9, 2013 letter, Defendant states:

“GE CAPTIAL RETAIL BANK is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more. Please consult your tax advisor concerning any tax questions.”

(See Exhibit “A”).

13. On December 10, 2013, Defendant Nationwide sent Plaintiff Good a communication in connection with a consumer debt allegedly due American Express. (See correspondence from Nationwide attached hereto as Exhibit “B”, redacted per Fed. R. Civ. Pro. 5.2).

14. In the December 10, 2013 letter, Defendant states:

“American Express is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more. Please consult your tax advisor concerning any tax questions.”

(See Exhibit “B”).

15. The statement in the collection letters that Nationwide’s client “is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more” is false and is misleading.

16. IRS Regulation 1.6050P requires that an “applicable entity” report a cancellation or discharge of indebtedness in excess of \$600.00 if, and only if, there has occurred an “identifiable event” described in paragraph (b)(2) of that section.

17. There are also seven exceptions to the reporting requirement. 26 CFR § 1.6050P-1(d).

18. One of the exceptions to the reporting requirement is for the case of a consumer bankruptcy. § 1.6050P-1(d)(1).

19. Mr. Soucek, for example, was contemplating filing for bankruptcy protection when he received the September 2013 dunning letter.

20. Mr. Soucek filed for bankruptcy protection on September 24, 2013 (M.D. Pa. Bky. Docket No. 13-4904). The (alleged) debt to GE Capital Retail Bank was subsequently discharged. No. 1099C form was “required to” be filed “with the Internal Revenue Service” under the tax regulation and to the best of Soucek’s knowledge, none was filed.

21. Another exception to the reporting requirement is the portion of a debt attributable to interest and other non-principal sums.

22. For purposes of information reporting for discharge(s) of indebtedness (*i.e.*, issuance of IRS 1099C form) “the discharge of an amount of indebtedness that is interest is not required to be reported ...” In the case of a lending transaction, “the discharge of an amount other than stated principal is not required to be reported ...” 26 CFR § 1.6050P-1(d)(2), (3).

23. In the case of Mr. Good and Mr. Soucek, (and the putative class) a portion of the debt claimed due was interest or other non-principal amounts.

24. As such, the declarative, unqualified statement in Defendant’s collection letter that AMEX or GE Capital Retail Bank “is required to file a form 1099C with the IRS for any cancelled debt of \$600 or more” is both literally false, and misleading to the consumer.

25. There are also other exceptions to the requirement to report discharges of indebtedness. *See* 26 CFR § 1.6050P-1(d).

26. Moreover, gratuitous reference in a collection letter that a creditor “is required” to provide information on the consumer to the Internal Revenue Service – especially where that may not be the case – is a collection ploy, a deception which suggests to the least sophisticated consumer that he or she could get in trouble with the IRS for refusal to pay the debt, or for obtaining any debt forgiveness of \$600 or more.

V. CLASS ALLEGATIONS

27. Plaintiffs bring this action on their own behalf and on behalf of a class designated pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure.

28. Plaintiffs propose to define the class (the “Class”) as follows:

- a. All persons with addresses in the Commonwealth of Pennsylvania;
- b. who were sent one or more collection letter(s) from Defendant Nationwide;
- c. that stated GE Capital Retail Bank or American Express “is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more”, or substantially identical statement;
- d. where the underlying debt being collected was incurred primarily for personal, family or household use;
- e. where the letter(s) bears a send date from July 11, 2013 through the date of filing of this Complaint.

29. The Class is believed to be so numerous that joinder of all members is impractical. This Complaint concerns mass-produced form collection letters.

30. There are questions of law or fact common to the Class. These include:

- a. Whether Defendant made false, deceptive or misleading representations in connection with the collection of a debt in violation of §1692e;
- b. Whether Defendant engaged in false representations and deceptive means to collect a consumer debt alleged due, in violation of 15 U.S.C. §1692e(10);
- c. Whether the form collection notice misstates the requirements of the IRS regulations.

d. Whether Defendant's reference to the "Internal Revenue Service" in its collection dun constitutes a deceptive collection practice.

31. The claims of the named Plaintiffs are typical of the claims of the Class. All are based on the same factual and legal theories.

32. Good and Soucek will fairly and adequately protect the interests of the Class. Plaintiffs have no interests antagonistic to those of the class, Plaintiffs' counsel are competent and experienced in consumer credit cases and class actions.

33. The questions of law or fact common to the Class predominate over any questions affecting only individual members, and a class action is superior to other available methods for the fair and efficient adjudication of this controversy. The Class members are consumer debtors, who may be unable to locate or afford to hire lawyers.

34. The Class may be certified under Fed.R.Civ.P. 23(b)(3), as such represents a superior method for the fair and efficient adjudication of this controversy in that:

a. Congress specifically contemplated FDCPA class actions as a principal means of enforcing the statute by private attorneys general. 15 U.S.C. §1692k.

b. The essence of Defendant's collection efforts is the deception of consumers.

c. The interest of Class members in individually controlling the prosecution of separate claims against debt collectors is small because the maximum statutory damages available in an individual action under the Act is \$1,000.00.

d. This Pennsylvania only, statutory damages class is likely to be easily manageable.

COUNT I – FAIR DEBT COLLECTION PRACTICES ACT

35. Plaintiffs repeat the allegations set forth above as if the same were set forth at length herein.

36. Defendant violated the FDCPA by sending collection notices to Plaintiffs and the members of the class which:

a. Make false, deceptive, or misleading representations or statements in connection with the collection of consumer debt, 15 U.S.C. § 1692e; and

b. Engage in false representation and deceptive means to collect a consumer debt, 15 U.S.C. §1692e(10).

WHEREFORE, Plaintiffs Bradley Good and Edward K. Soucek pray that this Court certify this matter as a class action under Fed. R. Civ. P. 23 and enter judgment for Plaintiffs and the Class members against the Defendant Nationwide Credit, Inc.;

a. Awarding damages to Plaintiffs and to the Class as provided for in 15 U.S.C. §1692k(a);

b. Awarding Plaintiffs and the Class their costs and reasonable attorney's fees; and

c. Granting such other relief as may be deemed just and proper.

VI. DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury as to all issues so triable.

DATE: 7/14/14

Respectfully submitted:



CARY L. FLITTER
THEODORE E. LORENZ
ANDREW M. MILZ

FLITTER LORENZ, P.C.
450 N. Narberth Avenue, Suite 101
Narberth, PA 19072
(610) 822-0782

CARLO SABATINI
BRETT FREEMAN
SABATINI LAW FIRM, LLC
216 N. Blakely Street
Dunmore, PA 18512
(570) 341-9000

Attorneys for Plaintiff and the Class

EXHIBIT "A"



Nationwide Credit, Inc.

2002 SUMMIT BOULEVARD SUITE 600
ATLANTA GA 30319
MONDAY-FRIDAY, 8AM TO 5PM 1-866-659-0711

RE: GE CAPITAL RETAIL BANK-AMAZON
Account Number: XXXXXXXXXXXX2127
Account Balance: \$613.03
Save!: \$429.13
Settlement Amount: \$183.90
Date: 09/09/2013

Let Us Help You!

Nationwide Credit, Inc. previously sent you a letter, more than thirty (30) days ago, advising you that your past due account was placed with us for collection. The account balance as of the date of this letter is shown above.

We are offering you an opportunity to settle this account in full for only **\$183.90**, saving you **\$429.13** on the balance owed!

For your convenience, you can make a payment using any one of the options below:



1. Go to: paynow.solveyourdebt.com
2. Enter your Account #: [REDACTED] 7749 and User ID: [REDACTED] 7457



Send a check or money order payable to Nationwide Credit, Inc. to the following address:
PO BOX 26314
LEHIGH VALLEY PA18002-6314
Reference your Account # on your check or money order



Call us at 1-866-659-0711.
If you are unable to pay according to the instructions above we can discuss other options.

GE CAPITAL RETAIL BANK is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more. Please consult your tax advisor concerning any tax questions.

We look forward to assisting you in resolving this account.

Nationwide Credit, Inc.

This communication is an attempt to collect a debt by a debt collector or a consumer collection agency and any information obtained will be used for that purpose.

C12
052012

*** Please See Reverse Side of This Letter for Important Consumer Information ***

Please Detach and Return this Stub in the Enclosed Envelope with your Check or Money Order - Make Sure the "Remit To" Address appears in the Window

PERSONAL AND CONFIDENTIAL

PO BOX 26314
LEHIGH VALLEY PA 18002-6314

13490



040/C12/901/09/09/2013



44885-10A65***AUTO**MIXED AADC 350
Edward Soucek
729 Saginaw St
Scranton PA 18505-3628

ACCOUNT NO:	XXXXXXXXXXXX2127
ID NUMBER:	[REDACTED] 7749
BALANCE DUE:	\$613.03
AMOUNT ENCLOSED:	

o Change of address: Print New Address on Back

REMIT TO:

|||||
NATIONWIDE CREDIT, INC.
PO BOX 26314
LEHIGH VALLEY PA 18002-6314

THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR OR A CONSUMER COLLECTION AGENCY AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Because of interest, late charges, and other charges that may vary from day to day, according to any agreement you have with your creditor, the amount due on the day you pay may be greater. Therefore, if you pay the entire balance of the amount shown above, an adjustment to the balance due may be necessary after we receive your payment. If your creditor requires an additional amount to consider your entire balance paid, we will inform you.

NOTE CHANGES ONLY

FIRST NAME	<input type="text"/>	MI	<input type="text"/>
LAST NAME	<input type="text"/>		
ADDRESS	<input type="text"/>		
	<input type="text"/>		
CITY	<input type="text"/>	HOME PHONE	<input type="text"/>
STATE	<input type="text"/>	ZIP	<input type="text"/>
	<input type="text"/>	WORK PHONE	<input type="text"/>

EXHIBIT "B"



Nationwide Credit, Inc.

PO BOX 26314
LEHIGH VALLEY PA 18002-6314
1-877-779-3472

RE: AMERICAN EXPRESS
Account Number: XXXXXXXXXX41001
Account Balance: \$10,094.47
Date: 12/10/2013



Let Us Help You!

Your outstanding balance with the above-referenced creditor is past due and has been referred to Nationwide Credit, Inc. for collection. The account balance as of the date of this letter is shown above.

We understand that the economic difficulties faced today are extremely stressful and we want to help lessen the stress of your debt obligation by offering you the opportunity to resolve this account now.

For your convenience, you can make a payment using any one of the options below:



Pay Online: PayNow.SolveMyDebt.Com NCI ID #: [REDACTED] 26 and User ID: [REDACTED] 45



Pay by Mail: PO BOX 26314 LEHIGH VALLEY PA18002



Pay by Phone: Toll free at 1-877-779-3472.

Unless you notify this office within thirty (30) days after receiving this notice that you dispute the validity of the debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within thirty (30) days after receiving this notice that the debt, or any portion thereof, is disputed, this office will obtain verification of the debt or obtain a copy of a judgment against you and mail you a copy of such judgment or verification. Upon your written request within thirty (30) days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This communication is an attempt to collect a debt by a debt collector or a consumer collection agency and any information obtained will be used for that purpose. American Express is required to file a form 1099C with the Internal Revenue Service for any cancelled debt of \$600 or more. Please consult your tax advisor concerning any tax questions. This demand for payment does not eliminate your right to dispute this debt or inquire for more information about this debt, as described in the previous paragraphs.

Because of interest, late charges, and other charges that may vary from day to day, according to any agreement you have with your creditor, the amount due on the day you pay may be greater. Therefore, if you pay the entire balance of the amount shown above, an adjustment to the balance due may be necessary after we receive your payment. If your creditor requires an additional amount to consider your entire balance paid, we will inform you.

Nationwide Credit, Inc.

A01,
05201

*** Please See Reverse Side of This Letter for Important Consumer Information ***

Please Detach and Return this Stub in the Enclosed Envelope with your Check or Money Order - Make Sure the "Remit to" Address appears in the Window

PERSONAL AND CONFIDENTIAL
PO BOX 26315
LEHIGH VALLEY PA 18002-6315

00787



023/A01A/A01/12/10/2013

46431-11A15*AUTO**ALL FOR AADC 190
Bradley Good
342 W Second St
Media PA 19063-2302

ACCOUNT NO:	XXXXXXXXXX41001
ID NUMBER:	[REDACTED] 0626
BALANCE DUE:	\$10,094.47
AMOUNT ENCLOSED:	

o Change of address: Print New Address on Back

REMIT TO:

NATIONWIDE CREDIT, INC.
PO BOX 26314
LEHIGH VALLEY PA 18002